

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ZEIKOS, INC.,

Plaintiff,

v.

WALGREEN CO.,

Defendant.

Case No. 1:23-cv-00303

Hon. Virginia M. Kendall

Magistrate Judge Keri L. Holleb Hotaling

**WALGREEN CO.'S MOTION TO STRIKE THE DECLARATION OF WILLIAM
DUNNEGAN OR, IN THE ALTERNATIVE, TO DISQUALIFY DUNNEGAN AS
COUNSEL IN THIS CASE**

Defendant Walgreen Co., by its undersigned counsel, respectfully moves this Court to strike the affidavit of William Dunnegan, counsel for Plaintiff Zeikos, Inc. for failure to comply with [Fed. R. Civ. P. 56\(c\)\(4\)](#). In the alternative, Walgreen Co. moves this Court to disqualify counsel pursuant to [L.R. 83.50](#) and [American Bar Association Model Rule 3.7](#). The bases for this motion are more fully set forth in the accompanying Memorandum in Support.

Dated: October 18, 2024

Respectfully submitted,

WALGREEN CO.

By: /s/ Robert M. Andalman
One of its Attorneys

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CERTIFICATE OF SERVICE

I, Robert M. Andalman, hereby certify that on October 18, 2024, I caused to be electronically filed the foregoing **WALGREEN CO.'S MOTION TO STRIKE THE DECLARATION OF WILLIAM DUNNEGAN OR, IN THE ALTERNATIVE, TO DISQUALIFY DUNNEGAN AS COUNSEL IN THIS CASE**, a true and correct copy of which will be served via the Court's EF/ECM system on all parties of record.

/s/ Robert M. Andalman